

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

---

CENTER FOR WORKPLACE  
COMPLIANCE (f/k/a EQUAL  
EMPLOYMENT ADVISORY COUNCIL),

*Plaintiff/Counterclaim Defendant,*

v.

LITTLER MENDELSON, P.C., LANCE E.  
GIBBONS, THERESA GOKTURK), et al.,

*Defendants and Counterclaimants.*

---

Case No. 1:20-cv-01387-AJF-JFA

**DECLARATION OF ANDREW KIESTER IN SUPPORT OF SEALING CERTAIN  
PORTIONS OF HEARING TRANSCRIPT**

I, Andrew Kiester, hereby declare and state the following:

1. I am employed by Littler Mendelson, P.C. as the Senior Director of Infrastructure and Security, and have been employed by Littler since January 2013. I am responsible for Littler's data centers, core IT network, infrastructure security team and overall network and IT configurations.

2. In connection with this declaration I have reviewed the Hearing Transcript from June 11, 2021. Portions of the transcript contain non-public details regarding defendant Littler's networks, data storage and data security tools. Because this non-public information, in conjunction with other information, could create data security risks, Littler considers it confidential.

I declare under penalty of perjury under the laws of the United States that foregoing is true and correct.

Dated: 7/19/21

  
\_\_\_\_\_  
Andrew Kiester